Clerk, U.S. District Court
Southern District of Texas
FILED

JUN 29 2015

David J. Bradley, Clerk of Court

A091 (Rev. 8/01) Criminal Complaint

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA
V.
SIERRA-Marin, Raul

CRIMINAL COMPLAINT

Case Number: C-15-817

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about **June 28, 2015** (Date) in **Brooks** County, in the Southern District of Texas defendant, **SIERRA-Marin, Raul**

a native and citizen of Mexico, and an alien who had been previously deported from the United States, was found unlawfully within the United States in Brooks County Texas, the said defendant having not obtained the consent of the Attorney General or the Secretary of the Department of Homeland Security for application for readmission into the United States,

in violation of Title **8** United States Code, Section(s) **1326**.
I further state that I am a(n) **Border Patrol Agent** (Official Title) and that this complaint is based on the following facts:

On June 28, 2015, Raul SIERRA-Marin was encountered by Border Patrol agents near Falfurrias, Texas. At the time of the encounter SIERRA was attempting to circumvent the United States Border Patrol Checkpoint by walking in the brush near Falfurrias, Texas. Agents determined SIERRA to be a citizen and national of Mexico without any immigration documents to be or remain in the United States legally. Record checks revealed SIERRA had been Ordered Removed from the United States by an Expedited Removal on January 18, 2014 and physically removed from the United States to Mexico on January 19, 2014. SIERRA was convicted of illegal entry on November 12, 2015 and served 15 days for the conviction. SIERRA shows to have been removed from the United States approximately 8 times. SIERRA stated his last entry into the United States was on June 22, 2015 near Hidalgo, Texas. At this time there is no evidence to indicate SIERRA has applied for re-admission into the United States by the United States Attorney General or the Secretary of the Department of Homeland Security. U.S. Border Patrol Prosecutions presented the facts to AUSA Michael Hess who accepted prosecution for 8 USC 1326, Re-entry after Deportation.

Signature of Complainant

Warren Thompson
Printed Name of Complainant

Sworn to before me and signed in my presence,
and probable cause found on:

June 29, 2015
Date

at **Corpus Christi, Texas**
City and State

Jason B. Libby U.S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer